

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
CHRISTINA MENZEL,

Plaintiff,

-v-

ROADGET BUSINESS PTE. LTD. et al.,

Defendants.

CIVIL ACTION NO.: 24 Civ. 860 (JGK) (SLC)

ORDER

SARAH L. CAVE, United States Magistrate Judge.

Pursuant to the discovery conference held today, March 12, 2025, (the “Conference”) it is ORDERED that the parties’ requests (ECF Nos. 142; 143; 147) are **GRANTED in part and DENIED in part** as follows:

1. Based on the discussion during the Conference, Plaintiff’s requests for production of documents in her bullet-point list of 15 categories (ECF No. 143 at 2 (“Category” or “Categories”)) shall proceed as follows:
 - a. Defendants represented that they have produced or will produce all documents responsive to Categories 1, 2, 3, 4, 11, 14 and 15.
 - b. As to Category 5, by **March 21, 2025**, Defendants shall file a letter of not more than two (2) pages setting forth whether they continue to assert that a privilege protects a document responsive to Plaintiff’s request concerning the guidelines and procedures used by Defendants’ in-house design team and, if so, the grounds on which the privilege applies. If necessary, the Court will thereafter provide Defendants’ counsel instructions to submit the responsive document for

in camera inspection and will allow Plaintiff to file a response of not more than two (2) pages.

- c. As to Category 6, Defendants represented that they produced responsive documents on March 11, 2025 and will supplement their previous interrogatory response.
 - d. As to Category 7, Defendants represented that they will produce all responsive documents by March 12, 2025 and will check again whether contracts exist from the 48 entities, including six United States-based entities, Plaintiff identified during the Conference.
 - e. As to Category 8, Defendants' counsel will inform Plaintiff's counsel how to interpret the spreadsheets previously produced, which Defendants represented are responsive to the discovery request.
 - f. As to Category 9, Defendants' Rule 30(b)(6) witness shall be prepared to testify regarding the United States-based team's process and tools for screening products for infringement.
 - g. As to Category 10, Defendants represented that no additional responsive documents exist.
 - h. As to Categories 12 and 13, Defendants' Rule 30(b)(6) witness shall be prepared to testify regarding the process used to screen products for infringement and practices regarding licensing intellectual property.
2. The depositions of Defendants' Rule 30(b)(6) witness, set for March 25, 2025, and Plaintiff Christina Menzel, set for April 7, 2025, shall occur as scheduled.

3. The parties confirmed the deposition of Adriana Perez, and they shall move expeditiously to complete it before the April 16, 2025 fact discovery deadline. (See ECF Nos. 122; 147 at 1).
4. Before April 16, 2025, Defendants' counsel shall contact Jeffrey Yee to discuss his availability for a deposition and meet and confer with Plaintiff to schedule and take Mr. Yee's deposition. (See ECF Nos. 122; 147 at 3–4).
5. Plaintiff's requested fact witness depositions of (i) Leon Li, (ii) Alice Zhang, (iii) a member of Defendants' design team—Plaintiff specifically identified Q. Li during the Conference—and (iv) a fact witness from Defendant Shenhe International Holding Co. Ltd. are **HELD IN ABEYANCE** pending the April 30, 2025 settlement conference and may be revisited thereafter. (See ECF Nos. 121; 142; 147 at 1–3).
6. Plaintiff's request for leave to move for sanctions is **DENIED**. (See ECF No. 143 at 1, 3).
7. Plaintiff's motion to file documents under seal (ECF No. 146) is **GRANTED**.

The Clerk of Court is respectfully directed to close ECF No. 146.

Dated: New York, New York
March 12, 2025

SO ORDERED.


SARAH L. CAVE
United States Magistrate Judge